

EXHIBIT “B”

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Wolverine Proctor & Schwartz, Inc.	:	
and	:	
Great American Alliance Insurance	:	
Co., Inc.,	:	
	:	
Plaintiffs and	:	
Counterclaim Defendants	:	
	:	
v.	:	CIVIL ACTION NO.
	:	04-12189-RWZ
	:	
XYZ Tape Corp.,	:	
William B. Wilbur,	:	
Defendants and	:	
Travelers Property Casualty	:	
Company of America,	:	
Defendant and Counterclaimant	:	
	:	

Plaintiffs' Rule 26(a)(1) Initial Disclosure

Plaintiffs Wolverine Proctor & Schwartz, Inc. ("Wolverine") and Great American Alliance Insurance Co., Inc. ("Great American") offer these initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) and Local Rule 26.2(A).

A. Identity of Individuals and Information

1. Eric K. Long, 156 South Road, North Hampton, New Hampshire 03862, telephone 603-964-8635. Former applications Engineer and Product Manager for Wolverine Proctor & Schwartz, Inc., 51 East Main Street, Merrimac, Massachusetts 01860, telephone 978-346-4541. He is currently employed by The CMM Group LLC, P.O. Box 5903, De Pere, Wisconsin 54115. Mr. Long has information regarding communications to which he was a party

EPA 0001 to EPA 0003

S&W 0001 to S&W 0012

P&S 0001 to P&S 0113

DLT 0001 to DLT 0042

DEM 0001 to DEM 0213

WILB 0001 to WILB 0569

Transcripts of Depositions of Palmer & Sicard (Day 1); Thomas Ludwig; Andrew Fardy, Ken Souza, Louis Toro (Day 1); William Wilbur (Day 1); Wolverine Proctor & Swartz, Inc. (by Eric Long, David McAfee, Todd Dudley); and Deposition Exhibits T vs. W. 1 to 250.

C. Computation of Damages and Supporting Evidence

In accordance with the Court's order at the Local Rule 16.1 Scheduling Conference see the attached.

D. Insurance Agreements

Not applicable. (A copy of the insurance agreement between Wolverine and Great American is available for inspection and copying.)

WOLVERINE PROCTOR & SCHWARTZ, INC.
by its attorneys,

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon ~~(each party appearing pre-se and)~~ the attorney of record for each other party by mail (by hand) on 2-3-05

Matthew J. Walko

Matthew J. Walko

Matthew J. Walko (BBO #562172)
Smith & Duggan LLP
Two Center Plaza, Suite 620
Boston, MA 02108-1906
(617) 228-4400

Dated: February 3, 2005

Wolverine Proctor Schwartz, Inc. v. XYZ Tape Corp.
U. S. District Court, D. Mass.,
C.A. No. 04-12189-RWZ
Initial Disclosure Fed. R. Civ. P. 26(a)(1)(C)
As Modified By Court Order

Smith & Duggan LLP Invoice	Total
11/01/02 through 12/31/02	\$399.00
01/01/03 through 02/28/03	\$4,045.24
03/01/03 through 04/30/03	\$20,105.44
05/01/03 through 06/30/03	\$17,486.72
07/01/03 through 07/30/03	\$6,649.35
08/01/03 through 08/18/03	\$6,319.36
08/19/03 through 08/31/03	\$4,862.75
09/01/03 through 09/09/03	\$4,107.56
09/10/03 through 09/16/03	\$8,600.00
09/17/03 through 09/23/03	\$7,570.45
09/24/03 through 09/30/03	\$6,392.83
10/01/03 through 10/06/03	\$7,454.21
10/07/03 through 10/09/03	\$6,368.48
10/10/03 through 10/13/03	\$6,513.63
10/14/03 through 10/15/03	\$6,799.98
10/16/03 through 10/20/03	\$6,820.67
10/21/03 through 10/24/03	\$5,550.98
10/25/03 through 10/31/03	\$6,328.73
11/01/03 through 11/05/03	\$5,182.17
11/06/03 through 11/12/03	\$5,701.35
11/13/03 through 11/30/03	\$6,672.89
12/01/03 through 12/17/03	\$4,519.99
12/17/03 through 12/31/03	\$5,454.72
01/01/04 through 01/05/04	\$6,954.24
01/06/04 through 01/07/04	\$6,282.00
01/08/04 through 01/13/04	\$5,447.00
01/14/04 through 01/16/04	\$7,011.00
01/17/04 through 01/19/04	\$5,787.00
01/20/04 through 01/21/04	\$9,167.80
01/22/04 through 01/22/04	\$5,413.00
02/01/04 through 02/12/04	\$7,949.32
02/13/04 through 02/29/04	\$7,497.60
03/01/04 through 06/30/04	\$3,574.11
07/01/04 through 07/28/04	\$4,294.00
07/29/04 through 07/31/04	\$4,105.69
08/01/04 through 08/31/04	\$5,139.40
09/01/04 through 09/22/04	\$5,046.00
09/23/04 through 09/30/04	\$4,711.80
10/01/04 through 10/10/04	\$4,485.00
10/11/04 through 10/15/04	\$4,491.00
10/16/04 through 10/31/04	\$5,954.47
11/01/04 through 11/30/04	\$2,542.00
12/01/04 through 12/31/04	\$6,036.54
Subtotal	\$271,795.47

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Off-S&D-Invoice Expenses (est.)	\$9,842.35
Non-Testifying Expert Fred Kern of CCA	\$6,290.32
Electrical Expert Andrew Diamond of Exponent Inc.	\$6,360.48
Chemical Engineering and Fire Cause and Origin Expert Donald Hoffman of Safety Engineering, Inc.	\$11,680.13
Total	\$305,968.75